

Roettl, G.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FERNANDO HIRSCH MERHEJ and KARIFER  
MERCANTILE E AGRICOLA EIRELI,

Plaintiffs,

vs.

I.C.S. INTERNATIONAL CUSTODY SYSTEM INC., ABC  
CORPORATIONS 1-50, ALEJANDRO GIL, and JOHN  
DOES 1-50,

Defendants.

Index No. 13 CV 0869 (JGK)

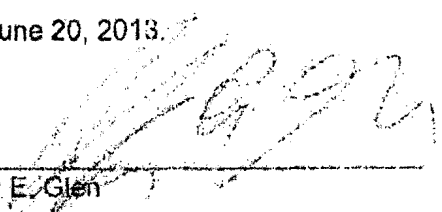
**STIPULATION**

Plaintiffs, through their attorneys Selvaratnam Law Office, PLLC, and  
Defendant Alejandro Gil, through his attorneys Anderson Kill & Olick PC, stipulate as  
follows:

1. Defendant Gil shall serve and file his motion to dismiss the  
Complaint on or before April 19, 2013.
2. Plaintiffs will serve and file their answering papers on or before May  
20, 2013.
3. Defendant Gil will serve and file his reply papers on or before June  
10, 2013.
4. If Plaintiffs elect to amend their Complaint, they shall do so on or  
before May 20, 2013, in which case the motion to dismiss shall be deemed moot and


withdrawn, and Defendant Gil shall serve and file his answer or motion addressed to the amended Complaint on or before June 20, 2013.

By:

  
Jeffrey E. Glen

ANDERSON KILL & OLICK, P.C.  
1251 Avenue of the Americas  
New York, NY 10020  
Telephone: 212-278-1000

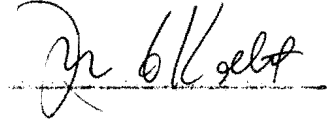
*Attorneys for Defendant Alejandro Gil*

  
Troy Selvaratnam

Selvaratnam Law Office, PLLC  
233 Broadway, Suite 2208  
New York, NY 10279

*Attorneys for Plaintiffs*

SO ORDERED:

  
4/19/13 gm